

Bonnie Fogdall

EIS001838

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FEB 28 2000

Subject: 10cfr963 Comment

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webserver@yucca-web2.ymp.gov on 02/28/2000 06:41:59 AM

To: 10CFR963
cc:

Subject 10cfr963 Comment

February 28, 2000 06:41:59

IP address: 198.240.90.22

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The Commentors Name:

---->Ms. Ellen B Thomas

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----> organization : Proposition One Committee

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Comment Text :

--1 Generally, for reasons of safety, we urge you to keep the nuclear waste where it is, safely contained, and don't risk transportation on our nation's (or others')

1 cont. highways, railways, rivers or oceans. Too many radioactive sites exist already; don't compound the problem. Instead, research should continue toward truly safe on-site containment and cleanup. Further, research should continue for a safe way to transmute or neutralize radioactivity.

Specifically with respect to the Draft Environmental Impact Statement for Yucca Mountain, there are several key problems you've been asked by Citizens Mass Energy Project to address. Reiterating them here (with the above general reservations):

- 2 . Accessibility. The DEIS constantly buries the reader in a jumble of confusing cross-references and redundancies. This obfuscation makes it difficult-if not impossible-for interested parties to navigate the three-volume report and to provide specific and clear comments to the DOE regarding the improvement of the DEIS.
- 3 . Transportation. The DEIS should clearly and accurately characterize the risks involved along the transportation routes, and it should use the most current information available to do so. Further, it should include site-specific data to show the effects of accidents in highly populated areas or areas where it would be difficult to retrieve a leaking cask (such as ravines and rivers) or where accidents might be more likely because of extreme weather, steep inclines, or sharp curves. The DEIS should also note which mode of transportation the DOE prefers-rail or truck.
- 6 . Transportation. The DEIS fails to address the fact that the number of shipments and the amount of radioactive material that will be shipped is unprecedented in world history. About 90% of the volume would be spent fuel from nuclear power plants, and virtually none of this type of material has ever been shipped before. The DOE has posted the routes it used to complete the DEIS on its web site. This is a good start, but this information should be included in the DEIS. The DEIS should include both maps and tables showing the routes and number of shipments expected on each route, as well as where the waste shipped on each route will originate, and how many casks will be involved (especially for rail shipments).
- 7 . Emergency Preparedness. The DEIS does not examine what emergency response personnel training and equipment would be needed in all of the communities along the transportation routes and what the specific impacts of a transportation accident would be. Many local communities lack the special equipment and training necessary to respond to a radiological accident. Further, many hospitals do not have isolation rooms for radioactively contaminated victims. This analysis should at least be done for the major population centers along the transportation routes (populations of 100,000 or more). The DEIS should indicate what emergency response equipment, facilities, and trained personnel are available in these communities, and what the effects of a transportation accident could be based on what is currently available.
- 8 . Environmental Justice. The DOE approached its environmental justice analysis by first reviewing the proposed action to see if it would likely result in high and adverse human health or environmental impacts to the general population, and then supposedly checking to see if any identified impacts would disproportionately affect specific minority or low-income communities. With this method, the DOE was unable to identify any environmental justice issues. It seems that in order to achieve true environmental justice, the DOE would need to identify all of the minority and low-income communities that could potentially be affected and then check to see if there would be any negative impacts to these communities that would be disproportionate to other communities.
- 9 [FINALLY, the risks inherent in massive movement of nuclear waste across mountains, plains, through storms, transported by fallible humans and deteriorating machines, is as irresponsible as was the production of this waste in the first place. It's time to stop. NOW!]

**EIS001838**

Ellen Thomas

Proposition One Committee

<http://propl.org>

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